

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Surface Impoundments Checklist (TAC 335.281-.288)

Class of Waste (1 H)

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1. Are surface impoundments presently used to treat or store waste? Yes ☒ No ☐
- a. If yes, inspect the impoundments.
- \*\*2. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? Yes ☒ No ☐
- \*\*3. Check for evidence of overtopping of the dike. Is the facility compliant? Yes ☒ No ☐
- \*\*4. Check for evidence of seepage. Is the facility compliant? Yes ☒ No ☐
5. Containment system for dyked or dammed impoundments (335.283)
  - \*\*a. Does the earthen dike have a protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? Yes ☒ No ☐
6. What wastes are treated or stored in the impoundment? Demincializer Acid & Base Wastewater and inorganic metal cleaning waste
7. Are waste analyses and trial tests conducted on these wastes (chemical processing of a different hazardous waste or method only)? N/A ☐ Yes ☒ No ☐
  - a. If not, does the owner/operator have written documented information on similar treatment of similar wastes? N/A ☒ Yes ☐ No ☐
8. Is this information retained in the operating record? N/A ☐ Yes ☒ No ☐
9. Is the impoundment inspected daily to check freeboard level? Yes ☒ No ☐
10. Is the impoundment, dikes and vegetation surrounding the dike inspected weekly to detect leaks, deterioration or failures? Yes ☒ No ☐

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\*(Changed 9/10/82, response format realigned, other minor changes)

\*\*See Note on Page 1

\*\*\*This response column indicates noncompliance.

\*\*\*

11. Does the impoundment have a liner? Yes ☒ No ☐

a. If Yes, what type? Clay compacted

b. If Yes, does it have a leachate collection and removal system? Yes ☐ No ☒

\*\*12. Is there evidence of ignitable or reactive wastes placed in the impoundment? Yes ☐ No ☒

a. If Yes, explain in comments sheet [review 335.118(a)];

or  
b. If Yes, is the impoundment used solely for emergencies? N/A ☒ Yes ☐ No ☐

\*\*13. Is there evidence of incompatible wastes placed in the impoundment [if yes, review 335.118(b)]? Yes ☐ No ☒

14. Are monitor wells required for this site? (Refer to Rule 335.191-.195 - Ground Water Monitoring) Yes ☒ No ☐

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81? Yes ☐ No ☒ See comments

NOTE 1: Attach Ground Water Monitoring Report if answer to question 14 is yes.

15. Describe impoundment(s) site and indicate plat map, location(s) and designation(s). Also describe each impoundment's dimensions and capacity (acre-feet):

See attached map, taken from Part A application  
Demin regenerant  $\approx$  500,000 gal. Inorg Metal Cleaning wastes  $\approx$  60,000 gal

NOTE 2: If the answer is No for Nos. 5a, 7a, 8, 9, 10 and No. 14 after 11/19/81, explain in comments sheet.

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\*(Changed 9/10/82, response format realigned)

\*\*See Note on Page 1

\*\*\*See Note Page 3

Checklist Surface Impoundment  
(attach to correct checklist)

Date June 22 1984

Reg./Permit No. 31638

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

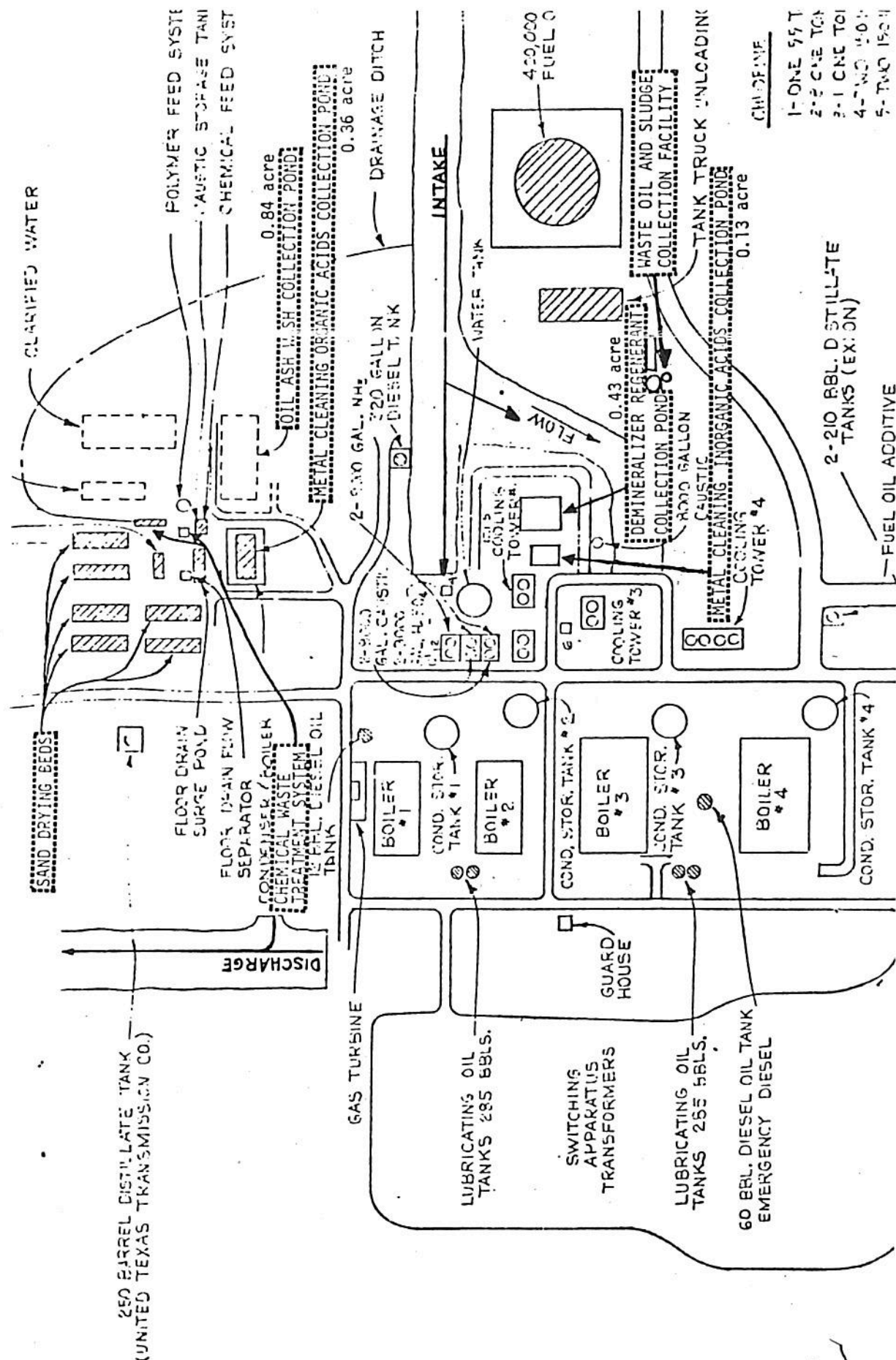
COMMENTS SHEET

SECTION: \_\_\_\_\_ Paragraph: 14 (a)

LAST SAMPLES ANALYZED WERE THOSE OF THE 1<sup>ST</sup> HALF OF 1983.

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_



- CH. OF. ME.
- 1- ONE 55 T
  - 2- 2 ONE TON
  - 3- 1 ONE TON
  - 4- TWO 500
  - 5- TWO 1500

2-210 RBL. DISTILLATE TANKS (EX. ON)

FUEL OIL ADDITIVE

250 BARREL DISTILLATE TANK  
(UNITED TEXAS TRANSMISSION CO.)

LUBRICATING OIL  
TANKS 285 BBL.

SWITCHING  
APPARATUS  
TRANSFORMERS

LUBRICATING OIL  
TANKS 265 BBL.

60 BBL. DIESEL OIL TANK  
EMERGENCY DIESEL

GAS TURBINE

GUARD  
HOUSE

BOILER  
#1

COND. STOR.  
TANK #1

BOILER  
#2

COND. STOR. TANK #2

BOILER  
#3

COND. STOR.  
TANK #3

BOILER  
#4

COND. STOR. TANK #4

COOLING  
TOWER #3

COOLING  
TOWER #4

DEMINERALIZER REGENERANT  
COLLECTION POND 0.43 acre

WASTE OIL AND SLUDGE  
COLLECTION FACILITY

420,000 FUEL OIL

TANK TRUCK UNLOADING  
COLLECTION POND 0.13 acre

METAL CLEANING INORGANIC ACIDS  
COLLECTION POND 0.36 acre

METAL CLEANING ORGANIC ACIDS  
COLLECTION POND 0.84 acre

TOIL ASH WASH COLLECTION POND

SEPARATOR

FLOOR DRAIN SURGE POND

POLYMER FEED SYSTEM

CAUSTIC STORAGE TANK

CHEMICAL FEED SYSTEM

CLARIFIED WATER

SAND DRYING BEDS

DISCHARGE

INTAKE

DRAINAGE DITCH



## INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Tanks Checklist (Rule 335.261-.267)Section A - General

\*\*\*

1. Are tanks presently used to treat or store waste? Yes ☒ No ☐
- a. If no, do not complete rest of form.
- b. If yes, check tanks. (Describe type of tank and indicate underground, above ground, or on-ground in comments sheet).
- c. Is there evidence that incompatible wastes have been placed in the tank? Yes ☐ No ☒
- (1) If yes, refer to 335.118(b) and explain in comments sheet.
- d. Check tank(s) for evidence of any ruptures, leaks or corrosion. Is facility compliant [335.264(a)(4)]? Yes ☐ No ☐
2. Are there any uncovered tanks? Yes ☐ No ☒
- a. If no, do not complete b. - e.
- b. If yes, do they have 2 feet (60 cm) freeboard? or N/A ☐ Yes ☐ No <sup>1</sup> ☐
- c. A containment structure? (e.g. dike or trench equal to volume of 2 feet of tank) or N/A ☐ Yes ☐ No <sup>1</sup> ☐ N/A
- d. A drainage control system? N/A ☐ Yes ☐ No <sup>1</sup> ☐
- e. A diversion structure? (e.g. standby tank) N/A ☐ Yes ☐ No <sup>1</sup> ☐
- NOTE 1: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank; any one yes answer for 2b, c, d or e indicates compliance.
3. Are any of the tanks continuous feed? Yes ☐ No ☒
- a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or bypass to a stand-by tank)? Yes ☐ No ☐ N/A

Section B - Waste Analysis

1. Is the tank used to store one waste exclusively? Yes ☐ No ☒
- a. If no, what are the different wastes stored in the tank?
- Spent VARSOL (solvent)
- WASTE Oils
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

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\*(Changed 9/10/82, added \*\*\* note and reworded some questions)

\*\*Note checklist questions to be noted or completed during on-site inspection

\*\*\*No checked in this column indicates noncompliance.

- b. Are waste analyses and trial treatment or storage tests done on these different wastes?  
NOTE 1: Not applicable for less than 90 day storage [335.69(a)(2)].

N/A \_\_\_ Yes \_\_\_ No <sup>\*\*\*</sup> ✓

- (1) If no, does he have written, documented information on similar storage or treatment of similar wastes?

N/A \_\_\_ Yes ✓ No \_\_\_

- c. Are there records available of these wastes analyses in the operating record?

N/A \_\_\_ Yes ✓ No \_\_\_

Section C - Inspections (Where Present) 335.264

1. Do the records indicate the owner/operator inspects, where present, the following at least daily:

- a. Discharge control equipment (e.g. waste feed cut-off, bypass and/or drainage system)?

Yes \_\_\_ No \_\_\_

- b. Monitoring equipment (e.g. pressure and temperature gages)?

Yes \_\_\_ No \_\_\_

- c. Level of waste in each uncovered tank?

Yes \_\_\_ No \_\_\_

2. Do the records indicate the owner/operator inspects the following at least weekly:

- a. Construction materials of tanks for corrosion or leaks?

Yes ✓ No \_\_\_

- b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage?

Yes ✓ No \_\_\_

3. Is there a written inspection schedule (Rule 335.116)?

Yes ✓ No \_\_\_

- a. If yes, is the schedule kept at the site?

Yes ✓ No \_\_\_

- b. If no for 3 or 3a, explain in the comments sheet.

4. Is there evidence of ignitable wastes placed in tanks? Yes \_\_\_ No ✓

- a. If yes, do records indicate that they are treated, rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable? or

Yes ✓ No <sup>2</sup> \_\_\_

- \*\*b. Is the waste protected from sources of ignition?

Yes \_\_\_ No <sup>2</sup> \_\_\_

- (1) If yes, use comments sheet to describe separation and confinement procedures.

- (2) If no, use comments sheet to describe sources of ignition. or

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\*(Changed 9/10/82, added \*\*\* note and 2 notes added)

\*\*See Note on Page 9

\*\*\*See Note on Page 9

\*\*\*

c. Is the tank used solely for emergencies?

Yes \_\_\_ No <sup>2</sup>✓

NOTE 2: Only one of the three questions 4a, b, c answered yes indicates compliance.

5. Is there evidence of reactive wastes placed in tanks? Yes \_\_\_ No ✓

a. If yes, do records indicate that they are treated rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of reactive? or

Yes \_\_\_ No <sup>1</sup>✓

\*\*b. Is the waste protected from sources of reaction?

Yes ✓ No <sup>1</sup>✓

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of reaction. or

c. Is the tank used solely for emergencies?

Yes \_\_\_ No <sup>1</sup>✓

NOTE 1: Only one of the three questions 5a, b, c answered yes indicates compliance.

6. Do the records indicate that incompatible wastes are placed in the same tank? Yes \_\_\_ No ✓

a. If yes, review 335.118(b) and explain in the comments sheet.

7. If a waste is to be placed in a tank that previously held an incompatible waste do operating records indicate that the tank was washed? Yes \_\_\_ No \_\_\_ N/A

a. If yes, review 335.118(b) and describe washing procedures. \_\_\_\_\_

b. Describe how it is possible for incompatible waste to be placed in the same tank. \_\_\_\_\_

NOTE: If the answer to Section A 2b-e and 3a, Section B 1b(1) and 1c, and Section C 1a-c, 2a, 2b, 3a, and 4a-c was no, explain in comments sheet.

8. Describe tank(s) site and indicate plat map location(s) and designation(s). Also describe size and capacity of each tank: \_\_\_\_\_

A 600 gal tank is in an enclosed shed

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\*(Changed 9/10/82)

\*\*See Note on Page 9

\*\*\*See Note on Page 9

## INDUSTRIAL SOLID WASTE

\*Closure and Post-Closure Compliance Review Checklist  
(TAC Section 335.211-.220)

\*\*

Note: List each type of hazardous waste T, S, D facility, number and volume in the comments sheet.

I. CLOSURE PLAN; Is there a written plan?Yes ☒ No ☐

1. Does the plan identify the \*MAXIMUM EXTENT OF OPERATION which will be unclosed during the life of the facility?

Yes ☒ No ☐

\*Note: The rules [335.213(a)(1)] require that the closure plans identify the maximum extent of the operation which will be unclosed during the life of the facility. If the plan is based on the expected extent of operations to be closed just prior to closure, it is important to consider whether that represents the "maximum" in this question.

2. Does the plan identify the steps for PARTIAL and/or COMPLETE CLOSURE [335.213(a)], at any time during the intended operating life, of

a. surface impoundments?

N/A ☐ Yes ☒ No ☐

b. landfills?

N/A ☒ Yes ☐ No ☐

c. tanks?

N/A ☒ Yes ☐ No ☐d. other (specify: N/A)Yes ☐ No ☐

3. Is there an estimate of the MAXIMUM INVENTORY of wastes in storage or treatment at any time during the life of the facility?

N/A ☐ Yes ☒ No ☐

4. Does the plan clearly identify the STEPS TO CLOSE [335.213(a)]?

a. at any point during the intended operating life?

Yes ☒ No ☐

b. at the end of the intended operating life?

Yes ☒ No ☐

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\*(Changed 10/13/83, added question to I above; this checklist is for use with "Part A" permit applicants that have not submitted "Part B" application)

\*\*This response column indicates noncompliance.

- ## COMMENTS

Tank GDP of 1985 = 400  
Surface Japaned = 200 of  
Surface Japaned (100)

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

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\*(Changed 10/13/83, added checklist for use with "Part A" permit applicants that have not submitted "Part B" application)

\*\*This response column indicates noncompliance.

II. POST-CLOSURE PLAN CHECKLIST; Is there a written plan?

*AL 10/13/82*  
\*\*  
\*N/A ☒ Yes \_\_\_ No \_\_\_

\*Note: If no post-closure required, proceed to Cost Estimate Checklist.

1. Does the post-closure plan provide for 30 years of post-closure care? N/A \_\_\_ Yes \_\_\_ No \_\_\_  
• How many years of post-closure care? \_\_\_\_\_
2. Does the plan clearly identify the ACTIVITIES required in the post-closure care? Yes \_\_\_ No \_\_\_
3. Do the MAINTENANCE PLANS for waste containment structures [335.218(a)(2)] include:
  - a. maintaining final cover (erosion damage repair) frequencies [335.344(d)(1)]? Yes \_\_\_ No \_\_\_
  - b. vegetation and fertilizing frequencies [335.218(a)(2)(A)]? Yes \_\_\_ No \_\_\_
  - c. collecting, removing, and treating leachate activities [335.344(d)(2)]? N/A \_\_\_ Yes \_\_\_ No \_\_\_
  - d. collecting, removing, and treating leachate frequencies [335.344(d)(2)]? N/A \_\_\_ Yes \_\_\_ No \_\_\_
  - e. gas collection activities [335.344(d)(3)]? N/A \_\_\_ Yes \_\_\_ No \_\_\_
  - f. gas collection frequencies [335.344(d)(3)]? N/A \_\_\_ Yes \_\_\_ No \_\_\_
4. Do MONITORING EQUIPMENT MAINTENANCE plans [335.218(a)(2)(B)] include:
  - a. activities? Yes \_\_\_ No \_\_\_
  - b. frequencies? Yes \_\_\_ No \_\_\_
5. Does the plan identify the name, address and phone number of the POST-CLOSURE PERIOD CONTACT [335.218(a)(3)]? Yes \_\_\_ No \_\_\_

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\*(Changed 10/13/82; added checklist for use with "Part A" permit applicants that have not submitted "Part B" application)

\*\*This response column indicates noncompliance.



6. For landfills, does the post-closure plan address the following objectives and indicate how they will be achieved [335.344(b)]?
  - a. Control of pollution migration via ground water, surface water, and air. N/A ☐ Yes ☐ No ☐
  - b. Control of surface water infiltration, including prevention of pooling. N/A ☐ Yes ☐ No ☐
  - c. Prevention of erosion. N/A ☐ Yes ☐ No ☐
7. For land treatment operations, does the post-closure plan address the following objectives and indicate how they will be achieved [335.327(a)]?
  - a. Control of migration of hazardous wastes and constituents into the ground water. N/A ☐ Yes ☐ No ☐
  - b. Control of the release of contaminated runoff into surface water. N/A ☐ Yes ☐ No ☐
  - c. Control of the release of airborne particulate contaminants caused by wind erosion. N/A ☐ Yes ☐ No ☐
  - d. Protection of food chain crops. N/A ☐ Yes ☐ No ☐
8. For landfills and land treatment operations, does the post-closure plan include at least a narrative statement indicating that the following factors were considered in addressing the closure objectives [335.327(b), 335.344(b)]?
  - a. Type and amount of waste. N/A ☐ Yes ☐ No ☐
  - b. Mobility and rate of migration. N/A ☐ Yes ☐ No ☐
  - c. Site location, topography, and surrounding land use. N/A ☐ Yes ☐ No ☐
  - d. Climate, including precipitation. N/A ☐ Yes ☐ No ☐
  - e. Characteristics of the cover, including material, final surface contour, thickness, porosity, permeability, slope, vegetation. N/A ☐ Yes ☐ No ☐

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\*(Changed 9/30/82, added checklist for use with "Part A" permit applicants that have not submitted "Part B" application)

★★This response column indicates noncompliance.

- ## COMMENTS

\*\*This response column indicates noncompliance.

III. COST ESTIMATE; Evaluated: 1984  
date

N/A    Yes ✓ No   

1. Is there a written closure cost estimate [335.232(a)]  
(Supp. 14 of Group I for estimated cost? Yes ✓ No   

2. Is the closure cost estimate adequate to cover all  
required closure activities [335.232(a)]? Yes ✓ No   

If "No", specify in comments.

3. Is there a written post-closure cost  
estimate [335.233(a)]? N/A ✓ Yes    No   

4. Is the annual estimate multiplied by 30 to  
cover the entire post-closure care period  
[335.233(b)]? N/A ✓ Yes    No   

or number of years   

5. Is the cost estimate adequate to cover all the activities  
in the post-closure plan [335.218(a)]? Yes    No    N/A

Including labor costs? Yes    No   

As well as the requirements of notice  
to local land authorities and in deeds  
(335.219 and .220)? Yes    No   

COMMENTS

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\*(Changed 10/13/83, added checklist for use with "Part A" permit applicants that  
have not submitted "Part B" application)

★★This response column indicates noncompliance.

# INDUSTRIAL SOLID WASTE

## Compliance Monitoring Inspection Report Ground Water Monitoring Program (335.191-.195)

### 1. Ground Water Monitoring Status:

Detection \_\_\_\_\_ : quarterly sampling \_\_\_\_\_ ; semi annual sampling ✓  
 Alternate \_\_\_\_\_ (date approved) Waiver \_\_\_\_\_ (date approved)  
 Assessment ✓ (date approved) Required but not monitoring \_\_\_\_\_

Yes No Not Applicable

### 2. Has the following been installed in the uppermost aquifer around the waste management area(s):

At least one hydraulically upgradient well?

✓ \_\_\_\_\_

At least three hydraulically downgradient wells?

✓ \_\_\_\_\_

### 3. If the waste management area includes multiple waste management facilities, is each facility adequately monitored?

✓ \_\_\_\_\_

### 4. Provide a diagram locating each monitoring well and waste site(s). List depths, diameter and completion data on each well not included on the previous inspection.

On file

### 5. Has an adequate ground water sampling and analysis plan been developed?

Date of evaluation: 1<sup>st</sup> sampling 7/13/82  
 If not, list deficiencies:

✓ \_\_\_\_\_

Is the plan followed?

\_\_\_\_\_ ✓

### 6. If monitoring for the first year, are the samples analyzed for:

NA

EPA drinking water standards?

\_\_\_\_\_ ✓

Ground water quality parameters?

\_\_\_\_\_

Ground water contamination parameters?

\_\_\_\_\_ ✓

Are 4 replicate measurements made for each upgradient well sample?

\_\_\_\_\_ ✓

Are ground water surface elevations determined at each well each sampling event?

\_\_\_\_\_ ✓

### 7. Does the facility have an adequate Ground Water Quality Assessment Plan outline?

Date of evaluation: 10/28/83

✓ \_\_\_\_\_

Approved 11/14/83

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Revised 10/13/83

8. For facilities in their second or later year of ground water sampling and analysis:

	Yes	No	Not Applicable
Are wells sampled and analyzed annually for ground water quality parameters?	—	<input checked="" type="checkbox"/>	—
Are wells sampled and analyzed semi-annually for ground water contamination parameters?	—	<input checked="" type="checkbox"/>	—
Are ground water surface elevations determined at each well for each sampling event?	—	<input checked="" type="checkbox"/>	— See comments
Were ground water surface elevations evaluated annually to determine whether monitoring wells are properly placed?	—	<input checked="" type="checkbox"/>	—
Were changes to the monitoring system necessary, to maintain compliance with 335.192(a)?	—	—	— See comments
If so, describe:			
Are 4 replicate measurements made for each upgradient and downgradient well sample?	—	<input checked="" type="checkbox"/>	—
If not, explain:			

9. Are statistical comparisons, using the Student's t-test at the 0.01 level of significance, performed:

Between the initial background mean and current upgradient well analyses for contaminated parameters?	—	<input checked="" type="checkbox"/>	See comments
Between the initial background mean and current downgradient well analyses for contamination parameters?	—	<input checked="" type="checkbox"/>	

If there is more than one upgradient well, are all the background data combined resulting in one background mean with variance for each contamination parameter or is each upgradient well mean and variance compared separately with downgradient well analyses? Circle appropriate phrase.

10. No significant increases (or pH decreases) in contamination parameters been found in the:

Upgradient wells?	<input checked="" type="checkbox"/>	—	<input checked="" type="checkbox"/>
If no, did the company report the upgradient well change on the annual report form?	—	<input checked="" type="checkbox"/>	
Downgradient wells?	—	<input checked="" type="checkbox"/>	

	Yes	No	Not Applicable
11. If significant increases (or pH decreases) in downgradient wells were detected, did the company:			
Resample the "affected" well(s), split the sample in two and analyze for the respective changing contamination indicator(s)?	<u>✓</u>	<u>    </u>	<u>    </u>
Confirm the significant difference?	<u>✓</u>	<u>    </u>	<u>    </u>
Notify the Executive Director within 7 days of confirmation?	<u>✓</u>	<u>    </u>	<u>    </u>
Submit a certified ground water quality assessment plan within 15 days of notifying Executive Director?	<u>✓</u>	<u>    </u>	<u>    </u>
12. If an assessment program is on-going, describe what has been completed so far.	Assessment report received 10/22/83 Approval 11/14/83 Implementation report received 6/24		
What is the expected completion date?	HLTP wishes to forgo any further assessment until closure is complete (see F-55 Revises Implementation Report)		
13. Ground water analyses indicate no hazardous waste or hazardous waste constituents detected?	<u>    </u>	<u>✓</u>	
If yes, was the original detection monitoring program reinstated?	<u>    </u>	<u>✓</u>	
If no, has an approved quarterly ground water monitoring program been implemented?	<u>    </u>	<u>✓</u>	
14. If the company is performing an alternate ground water monitoring program, is an adequate sampling and analysis plan followed?	<u>    </u>	<u>✓</u>	
15. Are all wells sampled with the same equipment and procedures?	<u>    </u>	<u>    </u>	See comments
Is sampling equipment cleaned between wells to prevent cross-contamination?	<u>    </u>	<u>    </u>	
16. Have records been kept of:			
Analyses for ground water parameters?	<u>✓</u>	<u>    </u>	
Calculations of means and variances?	<u>✓</u>	<u>    </u>	
Water surface elevations taken at each well each sampling event?	<u>✓</u>	<u>    </u>	
Calculations of significant differences?	<u>✓</u>	<u>    </u>	<u>    </u>

16. continued

Yes No Not Applicable

Analyses of duplicate samples for  
contamination confirmation?

✓          

Analyses of samples taken as a result of  
implementing the Ground Water Quality Assessment  
Plan?

     ✓     

Results of Ground Water Quality Assessment Plan:

Rates of migration?

     ✓     

Concentration of hazardous waste and/or  
constituents thereof?

     ✓     

Analyses of quarterly ground water samples?

     ✓     

*SIP  
completed*



HLAP Robinson

Checklist GWM  
(attach to correct checklist)

Date 6/22/84

Reg./Permit No. 31638

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: 8, 9, 15, 16 Paragraph: \_\_\_\_\_

LAST SAMPLES EVALUATED by HLAP were those of the 1<sup>st</sup> half  
of 1983. They are not sampling semi-annually (TACS 335.193(d)(2))  
They are therefore not in compliance with TACS 335.193(e) (relating  
to determination of groundwater elevation).

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

# INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Surface Impoundments Checklist (TAC 335.281-.288) Class of Waste (H)

\*\*\*

1. Are surface impoundments presently used to treat or store waste? Yes ☒ No ☐  
 a. If yes, inspect the impoundments.
- \*\*2. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? Yes ☒ No ☐
- \*\*3. Check for evidence of overtopping of the dike. Is the facility compliant? Yes ☐ No ☒
- \*\*4. Check for evidence of seepage. Is the facility compliant? Yes ☐ No ☒
5. Containment system for dyked or dammed impoundments (335.283)  
 \*\*a. Does the earthen dike have a protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? Yes ☒ No ☐
6. What wastes are treated or stored in the impoundment? Demineralizer reagent, inorganic metal cleaning wastes
7. Are waste analyses and trial tests conducted on these wastes (chemical processing of a different hazardous waste or method only)? N/A ☒ Yes ☐ No ☐  
 a. If not, does the owner/operator have written documented information on similar treatment of similar wastes? Yes ☒ No ☐
8. Is this information retained in the operating record? N/A ☐ Yes ☒ No ☐
9. Is the impoundment inspected daily to check freeboard level? Yes ☒ No ☐
10. Is the impoundment, dikes and vegetation surrounding the dike inspected weekly to detect leaks, deterioration or failures? Yes ☒ No ☐

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\*(Changed 9/10/82, response format realigned, other minor changes)

\*\*See Note on Page 1

\*\*\*This response column indicates noncompliance.

11. Does the impoundment have a liner?

Yes ☒ No ☐

a. If Yes, what type? CLAY

b. If Yes, does it have a leachate collection and removal system?

Yes ☐ No ☒

\*\*12. Is there evidence of ignitable or reactive wastes placed in the impoundment?

Yes ☐ No ☒

a. If Yes, explain in comments sheet [review 335.118(a)];  
or

b. If Yes, is the impoundment used solely for emergencies?

Yes ☐ No ☐

\*\*13. Is there evidence of incompatible wastes placed in the impoundment [if yes, review 335.118(b)]?

Yes ☐ No ☒

14. Are monitor wells required for this site? (Refer to Rule 335.191-.195 - Ground Water Monitoring)

Yes ☒ No ☐

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81?

Yes ☒ No ☐

NOTE 1: Attach Ground Water Monitoring Report if answer to question 14 is yes.

15. Describe impoundment(s) site and indicate plat map, location(s) and designation(s). Also describe each impoundment's dimensions and capacity (acre-feet):

500,000 gal impoundment demin reagent  
60,000 gal impoundment inorganic metal cleaning acids

NOTE 2: If the answer is No for Nos. 5a, 7a, 8, 9, 10 and No. 14 after 11/19/81, explain in comments sheet.

TDWR-

Page 4 of 27 of Group II

\*(Changed 9/10/82, response format realigned)

\*\*See Note on Page 1

\*\*\*See Note Page 3

# INDUSTRIAL SOLID WASTE

## Compliance Monitoring Inspection Report Tanks Checklist (Rule 335.261-.267)

Class of Waste (I)

\*\*\*

### Section A - General

1. Are tanks presently used to treat or store waste? Yes ☒ No ☐
  - a. If no, do not complete rest of form.
  - \*\*b. If yes, check tanks. (Describe type of tank and indicate underground, above ground, or on-ground in comments sheet).
  - \*\*c. Is there evidence that incompatible wastes have been placed in the tank? Yes ☐ No ☒
    - (1) If yes, refer to 335.118(b) and explain in comments sheet.
  - \*\*d. Check tank(s) for evidence of any ruptures, leaks or corrosion. Is facility compliant [335.264(a)(4)]? Yes ☒ No ☐
2. Are there any uncovered tanks? Yes ☐ No ☒
  - a. If no, do not complete - e.
  - \*\*b. If yes, do they have 2 feet (60 cm) freeboard? or N/A ☐ Yes ☐ No <sup>1</sup> ☐
  - \*\*c. A containment structure? (e.g. dike or trench equal to volume of 2 feet of tank) or N/A ☐ Yes ☐ No <sup>1</sup> ☐
  - \*\*d. A drainage control system? N/A ☐ Yes ☐ No <sup>1</sup> ☐
  - \*\*e. A diversion structure? (e.g. standby tank) N/A ☐ Yes ☐ No <sup>1</sup> ☐

NOTE 1: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank; any one yes answer for 2b, c, d or e indicates compliance.
3. Are any of the tanks continuous feed? Yes ☐ No ☒
  - \*\*a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or bypass to a stand-by tank)? Yes ☐ No ☐

### Section B - Waste Analysis

1. Is the tank used to store one waste exclusively? Yes ☐ No ☒
  - a. If no, what are the different wastes stored in the tank?

Waste oil (WCC 110450)  
Spent solvent VARSOL (WCC 110100)

TDWR-

Page 9 of 27 of Group II

\*(Changed 9/10/82, added \*\*\* note and reworded some questions)

\*\*Note checklist questions to be noted or completed during on-site inspection

\*\*\*No checked in this column indicates noncompliance.

c. Is the tank used solely for emergencies?

NOTE 2: Only one of the three questions 4a, b, c answered yes indicates compliance.

Yes \_\_\_ No <sup>2</sup> ☒

5. Is there evidence of reactive wastes placed in tanks?

Yes \_\_\_ No ☒

a. If yes, do records indicate that they are treated rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of reactive? or

Yes \_\_\_ No <sup>1</sup> ☐

\*\*b. Is the waste protected from sources of reaction?

Yes ☒ No <sup>1</sup> ☐

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of reaction. or

c. Is the tank used solely for emergencies?

NOTE 1: Only one of the three questions 5a, b, c answered yes indicates compliance.

Yes \_\_\_ No <sup>1</sup> ☐

6. Do the records indicate that incompatible wastes are placed in the same tank?

Yes \_\_\_ No ☒

a. If yes, review 335.118(b) and explain in the comments sheet.

7. If a waste is to be placed in a tank that previously held an incompatible waste do operating records indicate that the tank was washed?

Yes \_\_\_ No ☒ <sup>1</sup>

a. If yes, review 335.118(b) and describe washing procedures. \_\_\_\_\_

b. Describe how it is possible for incompatible waste to be placed in the same tank. \_\_\_\_\_

NOTE: If the answer to Section A 2b-e and 3a, Section B 1b(1) and 1c, and Section C 1a-c, 2a, 2b, 3a, and 4a-c was no, explain in comments sheet.

8. Describe tank(s) site and indicate plat map location(s) and designation(s). Also describe size and capacity of each tank: \_\_\_\_\_

600 gal capacity tank located in enclosed shed

# INDUSTRIAL SOLID WASTE

## Compliance Monitoring Inspection Report Ground Water Monitoring Program (Rule 335.191-.195)

1. Specify the site(s) for which a ground water monitoring system (has) or (should have) been installed: 2 surface impoundments  
demineralizer reagent and metal cleaning wastes
2. What date was the monitoring program initiated (date of first sampling)?  
7/13/82
3. Indicate by a map or sketch locations of each monitoring well and distance from active site(s) (attach). Also list depths, diameter and completion data on each well (or include well drilling and completion report).
4. If no ground water monitoring system has been installed, include a copy of Low Potential Ground Water Demonstration used to document a low potential for migration of hazardous waste or constituents. Also, describe briefly what basis was used to justify the waiver of monitoring requirements: \_\_\_\_\_
5. If a ground water monitoring system has been installed, attach a copy of the ground water sampling and analysis plan. Briefly describe sample collection technique for obtaining samples and the method used to establish elevation of ground water for ground water monitoring wells: Document is in file

\*\*\*

6. Has owner/operator submitted: all Quarterly reports? Yes ☒ No ☐  
all Annual reports? N/A ☐ Yes ☒ No ☐  
Note: Attach a copy of the most recent Quarterly/Annual Report(s).
7. Is a Ground Water Quality Assessment Plan outline maintained at the facility? N/A ☐ Yes ☒ No ☐
8. Has the owner/operator analyzed samples for:
  - a. EPA Interim Primary Drinking Water Standards? Yes ☒ No ☐
  - b. Ground Water Quality Parameters? Yes ☒ No ☐
  - c. Ground Water Contamination Parameters? Yes ☒ No ☐
9. If the answer to question 2, 6, 7 or 8 indicates noncompliance with Subchapter I and the corrective action letter sent to the facility operator does not explain the problem, explain in the comments sheet or by separate I.O.M.
10. Include in the comments sheet or separate I.O.M. your evaluation regarding the ground water monitoring system installed. Ground Water Monitoring Plan accuracy, completeness and technical adequacy should be addressed as well as deficiencies and a brief summary of site conditions, along with any recommendations.

since waste is not treated in ponds there is a greater chance for groundwater contamination

TDWR-

Page 20 of 27 of Group II

\*(Changed 9/10/82, added \*\*\* note and response columns realigned)

\*\*\*No checked in this column indicates noncompliance.



INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Surface Impoundments Checklist (Rule 156.22.17.001-008)  
\*335.281-.288

Class of Waste ( H )

1. Are surface impoundments presently used to treat or store waste? Yes XX No
- a. If yes, inspect the impoundments.
- \*\*2. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? Yes XX No
- \*\*3. Is there evidence of overtopping of the dike? Yes      No XX
- a. If yes or if less than 2 feet, explain in comments sheet.
4. Containment system for dyked or dammed impoundments (Rule 156.22.17.003). \*335.283
- \*\*a. Does the earthen dike have a protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? Yes XX No
- b. If no, explain in comments sheet.
5. What wastes are treated or stored in the impoundment? Demineralizer regenerant, inorganic metal cleaning wastes.
6. Are waste analyses and trial tests conducted on these wastes (chemical processing of a different hazardous waste or method only)? Yes XX No
- a. If not, does the owner/operator have written documented information on similar treatment of similar wastes? N/A Yes      No
7. Is this information retained in the operating record? Yes XX No
8. Is the impoundment inspected daily to check freeboard level? Yes XX No
9. Is the impoundment, dikes and vegetation surrounding the dike inspected weekly to detect leaks, deterioration or failures? Yes XX No

TDWR-

Page 3 of 20 of Group II

\*(Changed 2/5/82, Texas Administrative Code Section references added)

\*\*See Note on Page 1



\*\*a. Is there any evidence of seepage?

Yes \_\_\_ No XX

(1) If Yes, explain in comments sheet.

10. Does the impoundment have a liner?

Yes XX No \_\_\_

a. If Yes, what type? \_\_\_\_\_

b. If Yes, does it have a leachate collection and removal system?

Yes \_\_\_ No XX

\*\*11. Is there evidence of ignitable or reactive wastes placed in the impoundment?

Yes \_\_\_ No XX

a. If Yes, explain in comments sheet.  
or

b. Is the impoundment used solely for emergencies?

Yes \_\_\_ No XX

\*\*12. Is there evidence of incompatible wastes placed in the impoundment?

Yes \_\_\_ No XX

13. Are monitor wells required for this site? (Refer to Rule 156.22.12.001-.005 - Ground Water Monitoring) \*335.191-.195

Yes XX No \_\_\_

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81? Please see attached waiver.

Yes \_\_\_ No XX

NOTE 1: Attach Ground Water Monitoring Report if answer to question 13 is yes.

NOTE 2: If the answer is No for Nos. 6a, 7, 9, 9 and No. 13 after 11/19/81, explain in comments sheet. If the answer to No. 12 is yes, explain in comments sheet.

14. Describe impoundment(s) site and indicate plat map, location(s) and designation(s). Also describe each impoundment's dimensions and capacity (acre-feet):  
500,000 gallon surface impoundment for neutralization of demineralizer regenerant.  
60,000 gallon surface impoundment used for collection of inorganic metal cleaning acids.

TDWR-

Page 4 of 20 of Group II

\*(Changed 2/5/82 Texas Administrative Code Section references added)

\*\*See Note on Page 1

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Tanks Checklist (Rule 156.22.16.001-007)  
\*335.261-.267

Class of Waste ( H )

Section A - General

1. Are tanks presently used to treat or store waste? Yes XX No
- a. If no, do not complete rest of form.
- \*\*b. If yes, check tanks. (Describe type of tank and indicate underground, above ground, or on-ground in comments sheet). Yes     No
- \*\*c. Is there evidence that incompatible wastes have been placed in the tank? Yes     No XX
- (1) If yes, explain in comments sheet.
- \*\*d. Is there evidence of any ruptures, leaks or corrosion of the tank(s)? Yes     No XX
- (1) If yes, explain in comments sheet.
2. Are there any uncovered tanks? Yes     No XX
- a. If no, do not complete - e.
- \*\*b. If yes, do they have 2 feet (60 cm) freeboard? Yes     No     N/A
- or
- \*\*c. A containment structure? (e.g. dike or trench) Yes     No     N/A
- or
- \*\*d. A drainage control system? Yes     No     N/A
- \*\*e. A diversion structure? (e.g. standby tank)  
(NOTE: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.) Yes     No     N/A
3. Are any of the tanks continuous feed? Yes     No XX
- \*\*a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or bypass to a stand-by tank)? Yes     No     N/A

Section B - Waste Analysis

1. Is the tank used to store one waste exclusively? Yes     No XX
- a. If no, what are the different wastes stored in the tank?
- Waste oil, TDWR Seq. No. 001 (WCC 110450)
- Spent solvents, (Varsol) TDWR Seq. No. 005 (WCC 110100)
- The contents of the tank are reclaimed by S and R Oil Company.

TDWR

Page 9 of 20 of Group II

\*(Changed 2/5/82, Texas Administrative Code Section references added)

\*\* Note checklist questions to be noted or completed during on-site inspection

b. Are waste analyses and trial treatment or storage tests done on these different wastes?

Yes\_\_\_ No xx

(1) If no, does he have written, documented information on similar storage or treatment of similar wastes?

Yes xx No\_\_\_

c. Are there records available of these waste analyses in the operating record?

Yes xx No\_\_\_

### Section C - Inspections

1. Do the records indicate the owner/operator inspects, where present, the following at least daily:

a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage system)?

Yes\_\_\_ No\_\_\_ N/A

b. Monitoring equipment (e.g. pressure and temperature gages)?

Yes\_\_\_ No\_\_\_ "

c. Level of waste in each uncovered tank?

Yes\_\_\_ No\_\_\_ "

2. Do the records indicate the owner/operator inspects the following at least weekly:

a. Construction materials of tanks for corrosion or leaks?

Yes\_\_\_ No\_\_\_ N/A

b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage?

Yes\_\_\_ No\_\_\_ "

3. Is there a written inspection schedule (Rule 156.22.08.006)?

Yes\_\_\_ No\_\_\_ N/A

\*335.116

a. If yes, is the schedule kept at the site?

Yes\_\_\_ No\_\_\_ "

b. If no for 3 or 3a, explain in the comments sheet.

4. Is there evidence of ignitable wastes placed in tanks?

Yes xx No\_\_\_

a. If yes, do records indicate that they are treated, rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable? or

Yes\_\_\_ No\_\_\_ N/A

\*\*b. Is the waste protected from sources of ignition?

Yes xx No\_\_\_

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of ignition. or

c. Is the tank used solely for emergencies?

Yes\_\_\_ No xx

TDWR-

Page 10 of 20 of Group II

\*(Changed 2/5/82, Texas Administrative Section Code referenced added)

\*\*See Note on Page 9

5. Is there evidence of reactive wastes placed in tanks?

Yes\_\_\_ No XX

a. If yes, do records indicate that they are treated rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of reactive? or

Yes\_\_\_ No N/A

\*\*b. Is the waste protected from sources of reaction?

Yes\_\_\_ No N/A

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of reaction. or

c. Is the tank used solely for emergencies?

Yes\_\_\_ No XX

6. Do the records indicate that incompatible wastes are placed in the same tank?

Yes\_\_\_ No XX

a. If yes, explain in the comments sheet.

7. If a waste is to be placed in a tank that previously held an incompatible waste do operating records indicate that the tank was washed?

Yes\_\_\_ No N/A

a. If yes, describe washing procedures. \_\_\_\_\_

b. Describe how it is possible for incompatible waste to be placed in the same tank. \_\_\_\_\_

NOTE: If the answer to Section A 2b-e and 3a, Section B 1b(1) and 1c, and Section C 1a-c, 2a, and 2b was no, explain in comments sheet.

8. Describe tank(s) site and indicate plat map location(s) and designation(s). Also describe size and capacity of each tank: 600 gallon capacity. See attached map. The tank is located in an enclosed shed.

TDWR-

Page 11 of 20 of Group II

\*(Changed 2/5/82 Texas Administrative Code Section references added)

\*\* See Note Page 9

Checklist Tank  
(attach, to correct checklist)

Date May 17, 1982

INDUSTRIAL SOLID WASTE

Reg./Permit No. 31638

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: C Paragraph: 1, 2, 3.

The wastes are reclaimed therefore the regulations pertaining to inspections re-  
quirements are not applicable.

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

# INDUSTRIAL SOLID WASTE

## Compliance Monitoring Inspection Report Ground Water Monitoring Program (Rule 156.22.12.001-.005) #335.191-.195

1. Specify the site(s) for which a ground water monitoring system (has) or (should have) been installed: 2 surface impoundments, one holding demineralizer regenerant, one holding inorganic metal cleaning wastes.

2. What date was the monitoring program initiated (date of first sampling)?  
See attached "waiver".

3. Indicate by a map or sketch locations of each monitoring well and distance from active site(s) (attach). Also list depths, diameter and completion data on each well (or include well drilling and completion report).

4. If no ground water monitoring system has been installed, include a copy of Low Potential Ground Water Demonstration used to document a low potential for migration of hazardous waste or constituents. Also, describe briefly what basis was used to justify the waiver of monitoring requirements: See attached document.

5. If a ground water monitoring system has been installed, attach a copy of the ground water sampling and analysis plan. Briefly describe sample collection technique for obtaining samples and the method used to establish elevation of ground water for ground water monitoring wells: N/A

6. Attach a copy of the most recent Annual Report (if available). N/A

7. Is a Ground Water Quality Assessment Plan maintained at the facility?

Yes      No      N/A XXX

8. Has the owner/operator analyzed samples for:

a. EPA Interim Primary Drinking Water Standards?	Yes <u>    </u>	No <u>XX</u>
b. Ground Water Quality Parameters?	Yes <u>    </u>	No <u>XX</u>
c. Ground Water Contamination Parameters?	Yes <u>    </u>	No <u>XX</u>

9. If the owner/operator is in non-compliance with Subchapter 156 of the corrective action for or sent to the facility operator does not explain the problem, explain in the cover sheet or by separate L.O.M.

10.     

Page 10 of 10 (Group 1)

11.      Administer the code location reference added and Question

USE SEPARATE SHEET FOR EACH UNIT

HAZARDOUS WASTE LAND DISPOSAL UNIT DESCRIPTIONUnit No. 1 of 3

1. Facilities Name of Unit: Inorganic Metal Cleaning Surface Impoundment (SI-2)
2. Purpose/Mode of Operation: Intermittent storage of boiler cleaning wastewater prior to treatment
3. Process Code: S04
4. Design Capacity: .2 x 10<sup>6</sup> gal.  
(Cite Verification) Part B Application and information compiled from as-built drawings and plant personnel.  
Volume \_\_\_\_\_  
Rate 80 x 75 x 10 feet  
Depth of unit 10.5 feet  
Depth to ground water 40-45 feet - Groundwater Assessment Plan
5. Date of Existence: 1966  
(Cite Verification) Operation logs and personal notes of James Keith, Construction Department of Houston Power and Lighting
6. Dates of Last Hazardous and/or Non-hazardous Waste Addition: 10/4/85  
(Cite Verification) Certification of closure and personal notes of James Keith, Houston Power and Lighting
7. Closure Plan Submittal Date: 2/11/85
8. Hazardous Waste Code(s) Handled: Corrosive  
(Cite Verification) Describe: Industry operating knowledge is sufficient to classify the influent as hazardous due to its corrosive nature. Analysis on influent and sludges showed these materials not to exhibit the hazardous waste characteristic of EP toxicity.



9. Non-hazardous Waste Handled:

None

10. Provide Narrative of History of Operation Since 11-19-80; Cite References:

Purpose and mode of operation has not changed since 1980. The last HCL cleaning at the facility occurred in 1982. Since then, the impoundment has received only municipal water supply and filter backwash. This water was pumped to cooling tower as make-up water. Closure activities began on 10/4/85 and the unit was certified closed on 11/27/85 (Document 10). The residual soils were tested by EP Toxic procedures and did not reveal any constituents above established limits.

11. Field Observations:

Unit is closed and now has a concrete tank sitting on the site. The tank will be used as part of the facilities wastewater treatment system.

USE SEPARATE SHEET FOR EACH UNIT

HAZARDOUS WASTE LAND DISPOSAL UNIT DESCRIPTIONUnit No. 2 of 3

1. Facilities Name of Unit: Demineralizer-Regenerant Surface Impoundment (SL-1)
2. Purpose/Mode of Operation: Storage of demineralizer-regenerant wastewater prior to treatment
3. Process Code: S04
4. Design Capacity: .5 x 10<sup>6</sup> gal
- (Cite Verification) Part B Application information compiled from as-built drawings and plant personnel
- |                       |  |
|-----------------------|--|
| Volume                | <u>170 x 150 x 10 feet</u>                 |
| Rate                  | <u>Function of when unit need to flush</u> |
| Depth of unit         | <u>8 feet below grade</u>                  |
| Depth to ground water | <u>40-45 feet</u>                          |
5. Date of Existence: 1966
- (Cite Verification) Operation logs and information from plant personnel
6. Dates of Last Hazardous and/or Nonhazardous Waste Addition: Approximately August (3rd Quarter) 1986
- (Cite Verification) Mr. Bye stated that this is the date that waste was started to be pumped to new wastewater collection tank
7. Closure Plan Submittal Date: 2/11/85
8. Hazardous Waste Code(s) Handled: Corrosive

(Cite Verification) Describe:

Influent pH is variable; sometime high, sometime very low. However, Mr. Bye stated that a knowledge of industry operating practices is sufficient to deem the influents hazardous due to its corrosive characteristic. Testing of the influent and sludges showed these material not to exhibit the hazardous waste characteristics of EP toxicity.

9. Non-hazardous Waste Handled:

None

10. Provide Narrative of History of Operation Since 11-19-80; Cite References:

Purpose and mode of operation has not changed until closure activities began in 1986. Closure activity is complete and the facility is anticipating the PE certification of closure to be submitted shortly. A concrete tank to store surface water before it is used in facility processes will be built on this site.

11. Field Observations:

Impoundment is excavated and dry.

USE SEPARATE SHEET FOR EACH UNIT

HAZARDOUS WASTE LAND DISPOSAL UNIT DESCRIPTIONUnit No. 3 of 3

1. Facilities Name of Unit: Demineralizer-Regenerant Mixing Surface Impoundment (SI-6)
2. Purpose/Mode of Operation: Storage of demineralizer-regenerant water from Unit 2 of 3 prior to treatment
3. Process Code: S04
4. Design Capacity: 0.06 x 10<sup>6</sup> gal
- (Cite Verification) Part B information compiled from as-built drawings and plant personnel
- Volume 100 x 140 x 13
- Rate Rate is variable
- Depth of unit 12 feet below grade
- Depth to ground water 40 - 45 feet
5. Date of Existence: 1978
- (Cite Verification) Operation logs and personnel notes from plant personnel
6. Dates of Last Hazardous and/or Nonhazardous Waste Addition: August 1986
- (Cite Verification) Mr. Bye stated this is the date that waste was started to be pumped to new wastewater collection tank.
7. Closure Plan Submittal Date: 2/11/85
8. Hazardous Waste Code(s) Handled: Corrosive

(Cite Verification) Describe:

Facility contact stated it probably did not handle this since most neutralization occurred in unit #2 of 3. Facility contact stated operating knowledge of industry practices. The contact also stated that most of the neutralization takes place in Unit #2 of 3, so the influent may not be corrosive. Analysis on the influent and sludge showed these materials not to exhibit the hazardous waste characteristics of EP toxicity.

9. Non-hazardous Waste Handled:

Non-oily floor drainage waste, recycled wastewater from the waste treatment system and drainage from the chemical waste treatment system area.

10. Provide Narrative of History of Operation Since 11-19-80; Cite References:

There has been no change in the operation of this unit since it was constructed until closure activities began in August 1986. Closure activity is completed and the facility anticipates submitting the closure certification shortly. A liner will be constructed and non-oily floor drainage waste will be routed through this impoundment.

11. Field Observations:

The impoundment has been excavated and is ready for the construction of a liner.

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 1 of 5

1. Name of Unit: Chemical Waste Treatment System

2. Purpose/Associated Processes:

Treats inorganic cleaning wastes and oily wastes prior to NPDES discharge.

Sludges were analyzed for EP toxicity (Document 5) and classified as nonhazardous.

3. Type/Amount of Waste Received:

Stated above

4. Field Observation:

Concrete tank; appears to be well maintained

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 2 of 5

1. Name of Unit: Organic Waste Holding Pond

2. Purpose/Associated Processes:

Holding pond prior to transfer to boilers

3. Type/Amount of Waste Received:

Hydroxy acetic formic acid with wastewater

4. Field Observation:

Pond appears to be well maintained with two aeration stations in operation.



USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 3 of 5

1. Name of Unit: Sludge Drying Beds

2. Purpose/Associated Processes:

These were never used

3. Type/Amount of Waste Received:

None

4. Field Observation:

Four areas are slightly depressed below grade. No standing water in the depressed areas.

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 4 of 5

1. Name of Unit: Fresh water storage pond (2)

2. Purpose/Associated Processes:

Holding ponds for fresh water obtained from the municipal system

3. Type/Amount of Waste Received:

None

4. Field Observation:

Unlined ponds with several feet of freeboard. Water in ponds appeared clear and free of surface residue.

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 5 of 5

1. Name of Unit: Rinse water retention pond

2. Purpose/Associated Processes:

Storage of rinse water from plant processes. The facility contact was unsure of its use or purpose.

3. Type/Amount of Waste Received:

Facility contact unsure.

4. Field Observation:

Pond was filled with water with approximately 8 feet of freeboard. Two pipeliners surfaced near the pond and were connected with some sort of pump unit associated with the pond.

H. B. P. Co. Property Line  
AVE. N

Metal Cleaning Waste Surface Impoundment  
Liner Regenerant Surface Impoundment  
Liner Regenerate/Mixing Surface Impoundment  
Storage Area

622.000

3,282.000

is referred to N.G.S. adjustment of 1958  
adjustment of 1973 add 2.0 feet

N DATUM from Flood Insurance Rate Maps  
County, Texas dated May 2, 1983 and based on  
adjustment of 1973.

## LEGEND

Fire Hydrant

FLOOD PLAIN

HOUSTON LIGHTING & POWER CO.

P. H. ROBINSON PLANT

# SITE TOPOGRAPHY

SCALE: 1"=200'

DATE: 10-24-85

AVE. N

Metal Cleaning Waste Surface Impoundment  
zer Regenerant Surface Impoundment  
zer Regenerate/Mixing Surface Impoundment  
Storage Area

622,000

3,282,000

is referred to N.G.S. adjustment of 1958  
ustment of 1973 add 2.0 feet

N DATUM from Flood Insurance Rate Maps  
ounty, Texas dated May 2, 1983 and based on  
adjustment of 1973.

# EGEND

Fire Hydrant

FLOOD PLAIN

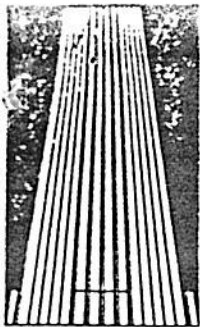
HOUSTON LIGHTING & POWER CO.

P. H. ROBINSON PLANT

## SITE TOPOGRAPHY

SCALE: 1"= 200'

DATE: 10-24-85



# Houston Lighting & Power Company

Electric Tower  
P.O. Box 1700  
Houston, Texas 77001

W. Little  
M. Minx  
J. D. Bowser  
C. L. Graham  
B. J. Mayo  
E. A. Pearson

(5)

April 8, 1981

Mr. Jay Snow  
Solid Waste Section  
Texas Department of Water Resources  
P. O. Box 13087, Capitol Station  
Austin, Texas 78711

Dear Mr. Snow:

**SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS**

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of the various waste streams and sludges generated at Houston Lighting & Power Company's generating stations. These waste streams and sludges were reported as being hazardous on our Part A, TDWR Hazardous Waste Registrations solely on the basis of Extraction Procedure (EP) Toxicity with the exception of metal cleaning inorganic acid waste, which was also listed on the basis of corrosivity, and demineralizer regenerant, which was listed only on the basis of corrosivity (See Attachment I).

The attached tables summarize the EP toxicity test results performed on each sample, including samples of demineralizer regenerant. The analyses were performed by our contract laboratory, Southern Petroleum Laboratories, and were done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. An attachment (Attachment II) has also been provided which identifies various abbreviations used in the summary tables to aid in your review.

The EP toxicity analytical data does not indicate the presence of toxic components in concentrations greater than the EP toxicity test limits. Therefore, as a result of our testing, we feel that those wastes previously considered hazardous due to EP toxicity should be declassified from the hazardous waste category.

It was stated above that two waste streams, demineralizer regenerant and metal cleaning inorganic acid wastes were listed as hazardous on the basis of corrosivity. The individual components that comprise each of these two waste streams when analyzed separately could result in pH values outside the specified range of the classification system. For example, if grab samples were taken of the cation and anion demineralizer regeneration wastes, the cation wastes could exhibit low pH values, and the anion wastes could exhibit high pH values.

Houston Lighting & Power Company

Mr. Jay Snow

April 8, 1981

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

However, a composite sample of all the demineralizer regeneration wastes, due to neutralization of the wastes, would be classified as simply solid wastes since the pH would fall between 2 and 12.5. The same type of example can be applied to metal cleaning inorganic acid waste as well, whereby the composite pH of the waste product would not qualify it as hazardous.

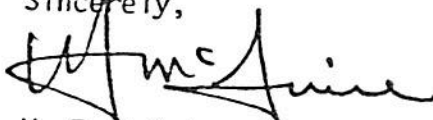
With respect to the corrosion of metals test to determine if a waste exhibits characteristics of corrosivity, many of the samples collected for EP toxicity analysis, including demineralizer regenerant and metal cleaning inorganic acid waste, were subjected to this test. The corrosivity analyses were performed in accordance with the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods." All samples indicated corrosion rates of less than 1 millimeter per year. This is substantially less than the 6.35 millimeter per year standard specified in the regulations.

It is also important to note that demineralizer regenerant and metal cleaning inorganic acid wastes are chemically treated and discharged under NPDES and TDWR wastewater discharge permits.

Considering the characteristics of demineralizer regenerant and metal cleaning inorganic acid waste described above and the corrosivity data, we do not feel that these two types of waste should be classified as hazardous waste prior to their treatment.

We therefore request declassification of all wastes specified in Attachment I. If you concur with our evaluation please notify us so that we can revise our Hazardous Waste Management program accordingly.

Sincerely,



W. F. McGuire, Manager  
Environmental Protection Department

RTB/mh

- Attachments -
- I. Waste Listing
  - II. Data Table Key
  - III. EP Toxicity Data Tables (six)
  - IV. Analytical Reports



## ATTACHMENT I

### HOUSTON LIGHTING & POWER COMPANY

#### WASTE LISTINGS

<u>WASTE DESCRIPTION</u>	<u>BASIS for LISTING AS HAZARDOUS</u>
<u>Demineralizer Regenerant</u>	C
<u>Demineralizer Regenerant Inorganic Sludge</u>	E
<u>Metal Cleaning Inorganic Acids</u>	EC
<u>Metal Cleaning Inorganic Sludge</u>	E
<u>Metal Cleaning Organic Acids</u>	E
<u>Metal Cleaning Organic Sludge</u>	E

C - Corrosive

E - E.P. Toxicity

## ATTACHMENT II

### HOUSTON LIGHTING & POWER COMPANY

#### DATA TABLE KEY

<u>PLANT NAME</u>	<u>PLANT ABBREVIATION</u>	<u>TDWR SOLID WASTE REGISTRATION NO.</u>
S. R. BERTRON	SRB	31637
CEDAR BAYOU	CBY	31639
H. O. CLARKE	HOC	31635
DEEPWATER	DWP	31632
GREENS BAYOU	GBY	31634
W. A. PARISH	WAP	31631
P. H. ROBINSON	PHR	31638
WEBSTER	WEB	31633
T. H. WHARTON	THW	31636

For some of the waste sampled there exists more than one set of data. This is due to one of two reasons; 1) sample collections representing different dates; 2) sample collections representing more than one storage/treatment facility for that particular type of waste. These samples are denoted by their direction relative to one another (N,S,E,W) or by number notation.

HOUSTON LIGHTING & POWER COMPANY  
 Hazardous Waste Management-Waste Analysis  
 Inorganic Acid (Liquid)

EP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
Arsenic	<0.05		<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Barium	5.3		<0.1	<0.1	2.3	17.2	1.3	<0.1	3.6
Cadmium	<0.05		<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Chromium	<0.05		<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Lead	<0.1		<0.1	<0.1	<0.10	<0.10	<0.1	<0.1	<0.1
Mercury	<0.005		<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Selenium	<0.05		<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Silver	<0.05		<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Endrin	<0.02		<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Heptachlor Epoxide	<0.4		<0.4	<0.4	<0.4	<0.4	<0.4	<0.4	<0.4
Methoxychlor	<1		<1	<1	<1	<1	<1	<1	<1
Toxaphene	<0.5		<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Dichlorophenoxyacetic	<1		<1	<1	<1	<1	<1	<1	<1
Trichlorophenoxypropionic	<1		<1	<1	<1	<1	<1	<1	<1

Cedar Bayou does not store/treat inorganic acid

BAD/bwt/DI

HOUSTON LIGHTING & POWER COMPANY  
Hazardous Waste Management-Waste Analysis  
Inorganic Acid (Sludge)

TP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
Arsenic	<1.0		<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Barium	16		31.5	28.5	2.4	<1	2.0	<0.1	10.7
Cadmium	<1.0		<1.0	<0.05	<0.05	0.05	<0.05	<0.05	<0.05
Chromium	<1.0		<1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Lead	<2.0		<2.0	<1	<0.1	<0.1	<0.1	<0.1	<0.1
Mercury	<0.01		<0.01	<0.005	<0.005	0.005	<0.005	<0.005	<0.005
Selenium	<1.0		<0.05	<0.05	<0.05	0.05	<0.05	<0.05	<0.05
Silver	<1.0		<1.0	<0.05	<0.05	0.05	<0.05	<0.05	<0.05
Endrin	<0.02		<0.02	<0.02	<0.02	0.02	<0.02	<0.02	<0.02
Endane	<0.4		<0.4	<0.4	<0.4	0.4	<0.4	<0.4	<0.4
Methoxychlor	<1		<1	<1	<1	<1	<1	<1	<1
Poxaphene	<0.5		<0.5	<0.5	<0.5	<0.5	<0.05	<0.05	<0.05
Dichlorophenoxyacetic	<1		<1	<1	<1	<1	<1	<1	<1
Trichlorophenoxypropionic	<1		<1	<1	<1	<1	<1	<1	<1

AD/bwt/D1

HOUSTON LIGHTING & POWER COMPANY  
 Hazardous Waste Management-Waste Analysis  
 Demineralizer Regenerant (Liquid)

EP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
Arsenic	<0.05	<0.05	<0.05	<0.05(N) <0.05(S)	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05 <0.05
Barium	<0.05	<0.05	<0.5	<0.5 <0.5	<0.05	<8.1	1.3	<0.05 3.7	<0.05 9.5
Cadmium	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05 0.07
Chromium	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05 <0.05
Lead	<0.1	<0.1	<0.1	<0.1 <0.1	<0.1	<0.1	<0.1	<0.1 <0.1	<0.1 <0.1
Mercury	<0.005	<0.005	<0.005	<0.005 <0.005	<0.005	<0.005	<0.005	<0.005 <0.005	<0.005 <0.005
Selenium	<0.02	<0.02	<0.02	<0.02 <0.02	<0.02	<0.05	<0.05	<0.05 <0.02	<0.05 <0.05
Silver	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05 <0.05
Endrin	<0.02	<0.02	<0.02	<0.02 <0.02	<0.02	<0.02	<0.02	<0.02 <0.02	<0.02 <0.02
Endane	<0.4	<0.4	<0.4	<0.4 <0.4	<0.4	<0.4	<0.4	<0.4 <0.4	<0.4 <0.4
Heptachlor	<1	<1	<1	<1 <1	<1	<1	<1	<1 <1	<1 <1
Hexachlorobenzene	<0.5	<0.5	<0.5	<0.5 <0.5	<0.5	<0.5	<0.5	<0.5 <0.5	<0.5 <0.5
Heptachlorocyclopentadiene	<1	<1	<1	<1 <1	<1	<1	<1	<1 <1	<1 <1
Heptachlorophenol	<1	<1	<1	<1 <1	<1	<1	<1	<1 <1	<1 <1
Heptachlorophenylpropionate	<1	<1	<1	<1 <1	<1	<1	<1	<1 <1	<1 <1

AD/bwt/D1



HOUSTON LIGHTING & POWER COMPANY  
 Hazardous Waste Management-Waste Analysis  
 Demineralizer Regenerant (Sludge)

SP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
Arsenic	<0.9	<1.0		<0.05	<0.05		<0.05	<0.05	<0.05
Barium	<1.7	<2.0		28.5	1.1		4.0	<0.1	<11.9
Cadmium	<0.9	<1.0		<0.05	<0.05		<1.0	<0.05	<0.05
Chromium	<0.9	<1.0		<0.05	<0.05		<1.0	<0.05	<0.05
Lead	<1.7	<2.0		<1	<0.1		<2.0	<0.1	<0.1
Mercury	<0.009	<0.01		<0.005	<0.005		<0.01	<0.005	<0.005
Selenium	<0.09	<1.0		<0.05	<0.05	NA	<0.05	<0.05	<0.05
Silver	<0.09	<1.0		<0.05	<0.05		<1.0	<0.05	<0.05
Endrin	<0.02	<0.02		<0.02	<0.02		<0.02	<0.02	<0.02
Endane	<0.4	<0.04		<0.04	<0.4		<0.4	<0.4	<0.4
Methoxychlor	<1	<1		<1	<1		<1	<1	<1
Toxaphene	<0.5	<0.5		<0.5	<0.5		<0.5	<0.5	<0.5
Dichlorophenoxyacetic	<1	<1		<1	<1		<1	<1	<1
Trichlorophenoxypropionic	<1	<1		<1	<1		<1	<1	<1

H. O. Clarke sludge sample unobtainable

AD/bwt/D1



**HOUSTON LIGHTING & POWER COMPANY**  
**Hazardous Waste Management-Waste Analysis**  
**Organic Acid (Liquid)**

EP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
Arsenic	<0.05	<0.05 <0.05(W) <0.05(S)		<0.05	<0.05(N) <0.05(S)	<0.05(#2) <0.05(#1)	<0.05	<0.05	<0.05
Barium	1.19	42 <0.5		<0.5	8.9 <0.05	11.5 <0.05	<0.1	0.12	1.1
Cadmium	<0.05	<0.05 <0.05 <0.05		<0.05	<0.05 <0.05	<0.05 2.89	<0.05	<0.05	0.08
Chromium	<0.05	<0.05 <0.1 <0.1		<0.05	<0.05 <0.1	3.75 <0.1	<0.05	<0.05	<0.05
Lead	<0.1	<0.1 <0.005 <0.005 <0.005		<0.1	<0.1 <0.005 <0.005	<0.1 <0.005	<0.1	<0.10	<0.1
Mercury	<0.005	<0.005 <0.05 <0.05		<0.005	<0.005 <0.05	<0.005 <0.02	<0.005	<0.005	<0.005
Selenium	<0.02	<0.05 <0.05 <0.1 <0.05		<0.05	<0.05 <0.05	<0.02 <0.5	<0.05	<0.05	<0.05
Silver	<0.05	<0.05 <0.02 <0.02 <0.02		<0.05	<0.05 <0.02 <0.02	<0.05 <0.02	<0.05	<0.05	<0.05
Tin	<0.02	<0.02 <0.04 <0.04		<0.02	<0.02 <0.4 <0.4	<0.02 <0.4	<0.02	<0.02	<0.02
Indane	<0.4	<0.4 <1 <1		<0.4	<0.4 <1 <1	<0.4 <1 <1	<0.4	<0.4	<0.4
Methoxychlor	<1	<1 <0.5 <0.5 <0.5		<1.0	<1 <0.5 <0.5	<1 <0.5 <0.5	<1	<1.0	<1
Noxaphene	<0.5	<1 <1 <1		<0.5	<0.5 <1 <1	<0.5 <1 <1	<0.5	<0.5	<0.5
Trichlorophenoxyacetic	<1	<1 <1 <1		<1.0	<1 <1 <1	<1 <1 <1	<1	<1	<1
Trichlorophenoxypropionic	<1	<1 <1 <1		<1.0	<1 <1 <1	<1 <1 <1	<1	<1	<1

H. O. Clarke does not store organic acid



HOUSTON LIGHTING & POWER COMPANY  
Hazardous Waste Management-Waste Analysis  
Organic Acid (Sludge)

EP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
Arsenic	<1.0	<1.0		<0.05	<0.05(N) <0.05(S)		<0.05	<0.05	<0.05
Barium	32.7	<2.0		3.6	8.1 7.9		79.7	7.5	12.4
Cadmium	<1.0	<1.0		<0.05	<0.05		<0.05	<0.05	<0.05
Chromium	<1.0	<1.0		<0.05	<0.05		0.28	<0.05	<0.05
Lead	<2.0	<2.0		<0.1	<0.1 <0.1		<0.1	<0.1	<0.1
Mercury	<0.01	<0.01		<0.005	<0.005 <0.005		<0.005	<0.005	<0.005
Selenium	<1.0	<1.0		<0.05	<0.05 <0.05	NA	<0.05	<0.05	<0.05
Silver	<1.0	<1.0		<0.05	<0.05 <0.05		<0.05	<0.05	<0.05
Indrin	<0.02	<0.02		<0.02	<0.02 <0.02		<0.02	<0.02	<0.02
Dane	<0.4	<0.4		<0.4	<0.4 <0.4		<0.4	<0.4	<0.4
Ethoxychlor	<1	<1		<1	<1 <1		<1	<1	<1
oxaphene	<0.5	<0.5		<0.5	<0.5 <0.5		<0.5	<0.5	<0.5
ichlorophenoxyacetic	<1	<1		<1	<1 <1		<1	<1	<1
richlorophenoxypropionic	<1	<1		<1	<1 <1		<1	<1	<1

H. O. Clarke does not store organic acid.

AD/bwt/D1



SOUTHERN PETROLEUM LABORATORIES, INC.

P.O. BOX 52768  
LAFAYETTE, LA 70P.O. BOX 10776  
JEFFERSON, LA 70P.O. BOX 378  
ACME, MI 49610

Certificate Number 045711

Invoice Number 123528

April 01, 1982

Houston Lighting & Power Company  
Energy Development Complex  
Room C 275  
P.O. Box 1700  
Houston, Texas 77001

Attention: Mr. R. T. Bye

Sample Description: PHR  
sludge tank tricellulator (Waste Oil and Sludge/  
Date Sampled: 03/03/82 Waste Oil and Sludge Collect:  
Date Received: 03/18/82 Facility)

			<u>Date</u>	<u>Time</u>	<u>Analyst</u>
<u>Trichlorophenoxypropionic</u>	< 1.0	mg/l	03/31/82	8:00 am	JM
<u>Dichlorophenoxyacetic</u>	< 1.0	mg/l	03/31/82	8:00 am	JM
<u>Silver total</u> EPA storet number 01077	< 0.05	mg/l	03/24/82	3:00 pm	KES
<u>Arsenic total</u> EPA storet number 01002	< 0.05	mg/l	03/26/82	8:00 am	KES
<u>Barium total</u> EPA storet number 01007	< 0.1	mg/l	03/25/82	3:00 pm	KES
<u>Cadmium total</u> EPA storet number 01027	< 0.05	mg/l	03/24/82	3:00 pm	KES
<u>Corrosivity</u>	< 1	mmpy	03/19/82	4:00 pm	DD
<u>Chromium total</u> EPA storet number 01034	< 0.05	mg/l	03/24/82	11:30 am	KES
<u>Endrin</u>	< 0.02	mg/l	03/31/82	8:00 am	JM
<u>Flash Point</u>	> 210	degF	03/29/82	1:00 pm	SRG
<u>Mercury total</u> EPA storet number 71900	< 0.005	mg/l	03/25/82	1:00 pm	KES
<u>Lindane</u>	< 0.4	mg/l	03/31/82	8:00 am	JM



SOUTHERN PETROLEUM LABORATORIES, INC.

HOUSTON, TX 77025  
P.O. BOX 52768  
LAFAYETTE, LA 70505  
P.O. BOX 10276  
JEFFERSON, LA 70181  
P.O. BOX 378  
ACME, MI 49610

Certificate Number 045711, page 2  
Houston Lighting & Power Company

<u>Methoxychlor</u>	< 1	<u>mg/l</u>	03/31/82	8:00 am	JDM
<u>Lead total</u> EPA storet number 01051	< 0.1	<u>mg/l</u>	03/24/82	10:00 am	KES
<u>Selenium total</u> EPA storet number 01147	< 0.05	<u>mg/l</u>	03/24/82	10:00 am	KES
<u>Toxaphene</u>	< 0.5	<u>mg/l</u>	03/31/82	8:00 am	JM

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: comparisons against known standards in each run, one in ten sample splits, and a quarterly method review against known spike samples.

SOUTHERN PETROLEUM LABORATORIES, INC.

*Sammy Russo*  
Sammy Russo

Table III-4 Hazardous Waste Facility Components List

Facility Component	Name	TDWR Seq. No.	Status		Design Capacity		Number of Years Utilized	Date in Service
			Inactive	Active	Proposed	(cu yds)	(gal)	(lbs)
Lagoon/Pond (lined)		01		X			500,000	
Verbal Description: clay lined pond for the collection and equalization of demineralizer regeneration waste prior to treatment.								
Lagoon/Pond (lined)		02		X			200,000	
Verbal Description: clay lined pond for the collection of metal cleaning inorganic waste from boiler and condenser cleanings. Last used on April 16, 1982.								
Boiler/Energy Producing		03		X			NA	
Verbal Description: Boiler for incineration of spent solvents mixed with waste oil.								
Drum Storage Area (enclosed)		04		X			NA	
Verbal Description: Drum storage area for the collection of spent solvents and waste paint thinner prior to offsite disposal.								
Lagoon/Pond (lined)		06		X			60,000	
Verbal Description: clay lined pond for the collection and equalization of demineralizer regeneration waste prior to treatment.								
Other Container Storage Area				X			NA	
Verbal Description: Covered bins for storage of sandblasting grit prior to offsite disposal.								

Certificate Number 050543  
Invoice Number 132105  
October 13, 1982

Houston Lighting & Power Company  
Energy Development Complex  
Room C 275  
P.O. Box 1700  
Houston, Texas 77001

Attention: Mr. Doug Chin

Sample Description: P. H. Robinson  
CWTS Sludge

Date Sampled: 09/03/82

Date Received: 09/07/82

			<u>Date</u>	<u>Time</u>	<u>Analyst</u>
<u>Trichlorophenoxypropionic</u>	< 0.01	<u>mg/l</u>	09/22/82	3:00 pm	RB
<u>Dichlorophenoxyacetic</u>	< 0.1	<u>mg/l</u>	09/22/82	3:00 pm	RB
<u>Silver total</u> EPA storet number 01077	< 0.05	<u>mg/l</u>	09/13/82	3:00 pm	DDP
<u>Arsenic total</u> EPA storet number 01002	< 0.05	<u>mg/l</u>	09/29/82	10:00 am	JDM
<u>Barium total</u> EPA storet number 01007	1.6	<u>mg/l</u>	09/17/82	2:00 pm	SLB
<u>Cadmium total</u> EPA storet number 01027	< 0.02	<u>mg/l</u>	09/17/82	4:00 pm	DDP
<u>Chromium total</u> EPA storet number 01034	< 0.05	<u>mg/l</u>	09/22/82	10:00 am	SLB
<u>Endrin</u>	< 0.0002	<u>mg/l</u>	09/22/82	2:00 pm	RB
<u>Flash Point</u>	> 200	<u>degF</u>	09/30/82	2:00 pm	JDM
<u>Mercury total</u> EPA storet number 71900	< 0.005	<u>mg/l</u>	09/15/82	4:00 pm	SLB
<u>Lindane</u>	< 0.004	<u>mg/l</u>	09/22/82	3:00 pm	RB
<u>Methoxychlor</u>	< 0.1	<u>mg/l</u>	09/22/82	3:00 pm	RB

Certificate Number 050543, page 2  
Houston Lighting & Power Company

<u>Lead total</u> EPA storet number 01051	< 0.1	<u>mg/l</u> 09/22/82 10:00 am	SLB
<u>Selenium total</u> EPA storet number 01147	< 0.02	<u>mg/l</u> 09/13/82 3:00 pm	SLB
<u>Toxaphene</u>	< 0.005	<u>mg/l</u> 09/22/82 3:00 pm	RB

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: comparisons against known standards in each run, one in ten sample splits, and a quarterly method review against known spike samples.

SOUTHERN PETROLEUM LABORATORIES, INC.

  
Sammy Russo